

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



January 28, 2008

Ventura County Resource Management Agency, Planning Division
Attn: Dan Klemann, M.A., Senior Planner
800 South Victoria Avenue, L#1740
Ventura, California 93009

**Notice of Preparation of a Draft Environmental Impact Report for the Simi Valley
Landfill Expansion, Case No. LU07-0048**

Dear Mr. Klemann:

As the County is well aware, the proposed project and its incorporated buffer zone, lie both adjacent to, and directly within, one of two critical habitat linkages between the Santa Susana Mountains and the Simi Hills. To fully disclose the regional importance of the subject property, the Draft Environmental Impact Report (DEIR) must clearly show and describe how the project applicant owns, and/or controls, a much larger, contiguous area than the 887-acre project area in the Notice of Preparation.

The proposed project appears to be well planned and compatible with the site. We concur however that the project as proposed would result in numerous significant ecological impacts. The vast scale of the project and its unique impacts warrant commensurate mitigation measures. It imperative that the project result in the permanent protection of the following three resources: the Alamos Canyon habitat linkage using the broad, open air connection under the 118 Freeway (former interchange location) and all lands associated with the applicant south of the freeway, all core habitat located west and north of the proposed landfill expansion footprint, and all portions of Alamos Canyon drainage outside of the proposed expansion disturbance footprint.

The attached map on an aerial photograph base shows where a proposed open space dedication line should be to achieve these mitigation objectives. This proposed balance of mitigation area simultaneously provides for the full project as proposed and all key ecological mitigation imperatives. The open space dedication area within the proposed 516-acre buffer area could be a conservation easement to a minimum of two public agencies, and the remainder of the described open space area must be dedicated in fee simple to a public agency to secure the permanent mitigation values of these lands. That dedication must occur simultaneously with the issuance of the first permit of any nature.

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This proposed approximately 1,600-acre open space set aside would provide regional benefits to match the regional scale of the proposed landfill operations and their impacts. The Mountains Recreation and Conservation Authority (MRCA) is in negotiations with a landowner to acquire an approximately 2.5-acre property on the north side of Los Angeles Avenue that in concert with the above described landfill open space dedication would provide a regionally significant trailhead into the Santa Susana Mountains. The property has space for parking and has direct driveable access under the railroad tracks. Other public access could be available from Moorpark too,

The proposed landfill operation is significant in size and its potential effects. Nothing short of the open space protection proposed in this letter would provide adequate compensating ecological function and recreational and viewshed opportunity to offset various levels of different adverse impacts. To ensure that the open space areas are well maintained and safe for the life of the project, tipping fees should pay for a modest level of maintenance.

Please direct any future correspondence or questions to Paul Edelman of our staff at the above address and by phone (310) 589-3200 ext. 128

Sincerely,

ELIZABETH A. CHEADLE
Chairperson